

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ANGELA NOVY, *et al.*,

Plaintiffs,

v.

No.: 4:16-cv-01233-CDP

C.R. BARD, INC., *et al.*,

Defendants.

**MOTION TO REMAND**

Pursuant to 28 U.S.C. § 1447(c) and for the reasons set forth in Plaintiffs' Memorandum in Support of Motion to Remand, which Plaintiffs incorporate herein by reference, Plaintiffs move for an Order remanding this action to the Circuit Court for the Twenty-Second Judicial Circuit, City of St. Louis, State of Missouri for lack of subject matter jurisdiction.

Respectfully submitted,

**NIEMEYER, GREBEL & KRUSE, LLC**

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via the Court's CM/ECF filing system, this 8<sup>th</sup> day of August, 2016, to all counsel of record.

/s/ Michael S. Kruse